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6 **UNITED STATES DISTRICT COURT**  
7 **WESTERN DISTRICT OF WASHINGTON**  
8 **AT SEATTLE**

9 FEDERAL TRADE COMMISSION, *et al.*,

10 Plaintiffs,

11 v.

12 AMAZON.COM, INC., a corporation,

13 Defendant.

**CASE NO.: 2:23-cv-01495-JHC**

**STIPULATED MOTION AND  
ORDER TO SEAL PORTIONS OF  
THE AMENDED COMPLAINT**

NOTE ON MOTION CALENDAR:  
Thursday, March 14, 2024

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15 The parties, by and through their attorneys of record, respectfully request that the Court  
16 enter the proposed order set forth below, sealing portions of Plaintiffs' Amended Complaint.

17 In support of this request, the parties represent the following to the Court:

- 18 1. On February 13, 2024, the Court issued a Case Scheduling Order setting March  
19 14, 2024 as the deadline to join additional parties. Dkt. #159.
- 20 2. Pursuant to that Order, Plaintiffs are filing an Amended Complaint that joins as  
21 plaintiffs the Commonwealth of Puerto Rico and the State of Vermont. The only  
22 changes in the Amended Complaint relate to this joinder.
- 23  
24

3. The Court previously entered two orders sealing portions of the Complaint. Dkts. #108, 120.

4. The Amended Complaint includes information the Court previously ordered to be sealed. *Id.* That information is highlighted in the Amended Complaint.

5. Plaintiffs are filing a public version of the Amended Complaint redacting only the information the Court previously ordered to be sealed. *Id.*

6. Pursuant to Local Civil Rule 5(g)(3)(A), the undersigned counsel certify that they met and conferred to reach the agreement described in this Stipulated Motion.

The following attorneys conferred by telephone on March 14, 2024: Edward H. Takashima and Kara King for the FTC and Constance T. Forkner for Amazon.

7. The parties stipulate as follows, subject to Court approval, and jointly request that the Court enter the following Order approving this Stipulation:

a. The highlighted portions of the Amended Complaint shall be sealed.

Stipulated to and respectfully submitted this 14th day of March, 2024, by:

s/ Edward H. Takashima

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**ORDER**

IT IS SO ORDERED.

DATED this 15th day of March, 2024.

A handwritten signature in black ink, reading "John H. Chun". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE